



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

January 28, 2013

Bud C. Cribley, State Director  
Bureau of Land Management Alaska State Office  
222 West Seventh Avenue, #13  
Anchorage, Alaska 99513-7504

Re: EPA comments on the Final Environmental Impact Statement for the Bureau of Land Management National Petroleum Reserve-Alaska, EPA Project # 10-045-BLM.

Dear Mr. Cribley:

We have reviewed the Final Environmental Impact Statement for the Bureau of Land Management National Petroleum Reserve-Alaska Integrated Activity Plan in the North Slope Borough, Alaska (CEQ # 20120091) in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act.

We previously rated the Draft EIS EC-2 (Environmental Concerns-Insufficient Information) based on our concerns regarding potential impacts to water quality, air quality, wildlife habitat and subsistence activities, as well as deficiencies in information regarding air modeling and differential setbacks from water bodies.

BLM has selected Alternative B-2, a modified version of what we determined to be the environmentally preferable alternative, as its preferred alternative. We believe this selection, in addition to added mitigations identified in the Final EIS, substantially address many of our previously identified concerns regarding impacts to water quality, habitat, and subsistence. We believe this cautious approach to allowing oil and gas activities on the NPR-A will further a balance between responsible management and the need for exploration and development.

We are pleased to see that Appendix H provides some of the air quality information we noted was lacking in the Draft EIS. This information includes modeling results that predict violations of air quality standards (1-hr NO<sub>2</sub> and 24-hr PM<sub>10</sub>) and exceedances of visibility thresholds. However, we believe it would have been valuable to include the AERMOD near field and CALPUFF far field modeling analyses and results for the preferred alternative in the Environmental Consequences section of the main document rather than in Appendix H. We would like to collaborate on future analyses to come to agreement on the data inputs, analysis and model results needed to achieve consistency with the 2011 Interagency MOU for Oil and Gas Decisions under NEPA.

We recommend that future planning-level NEPA analyses include a discussion that demonstrates compliance with the NAAQS (e.g., tables from Appendix H). This discussion would identify the predicted violations, their significance and associated mitigation measures, and include a description of the emissions inventories (i.e., allowable or actual emission rates, stack parameters, identification of

controlled or uncontrolled emissions, and a map of source locations), graphics identifying receptor points, and BLM's definition of ambient air per facility or pad, as used in the modeling. Allowable or potential to emit is preferred for the modeling. Finally, we recommend that appropriate references be included so that we know the source of the information, data and assumptions.

We note that the EPA staff has provided guidance and recommendations to air quality staff related to emissions inventories and modeling assumptions that, while not incorporated into this EIS, will be valuable for future ones. We are hopeful that subsequent NEPA analyses, including those for specific projects will provide the information required under the MOU and that this information will be incorporated, at least in summary, in Environmental Consequences sections. We look forward to working with BLM to improve future air quality evaluations.

We appreciate the opportunity to offer comments on the Final EIS. Please contact me with any questions you have regarding our comments at (206) 553-1601 or by email at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov) or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by email at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

cc: Serena Sweet, BLM-Alaska State Office